

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

BOILERMAKERS NATIONAL ANNUITY
TRUST FUND, on behalf of itself and all
others similarly situated,

Plaintiff,

WAMU MORTGAGE PASS THROUGH CERTIFICATES, SERIES 2006-ARI *et al.*

Defendants.

NEW ORLEANS EMPLOYEES' RETIREMENT SYSTEM, *et al.*,

Plaintiffs.

FEDERAL DEPOSIT INSURANCE
CORPORATION AS RECEIVER FOR
WASHINGTON MUTUAL BANK, *et al.*,
Defendant

Defendants.

NEW ORLEANS EMPLOYEES' RETIREMENT SYSTEM, *et al.*,

Plaintiffs.

THE FIRST AMERICAN CORPORATION, *et al.*

Defendants.

**STIPULATION AND ORDER REGARDING FILING SCHEDULE
(CV09-0037 MJP)**

HILLIS CLARK MARTIN &

PETERSON, P.S.
1221 Second Avenue, Suite 500
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1 **I. STIPULATION**

2 Briefing is currently underway on the applications for appointment of lead plaintiff,
 3 lead counsel, and interim lead counsel in this consolidated action. In anticipation of the Court
 4 ruling on those motions and appointing lead plaintiff(s) and lead counsel(s) for this action, the
 5 parties have met and conferred regarding a proposed schedule for filing a consolidated
 6 complaint and any motions to dismiss that complaint. In accordance with the agreement
 7 reached during that meet and confer process, co-applicants for lead plaintiff status
 8
 9 Policemen's Annuity And Benefit Fund Of The City Of Chicago and Boilermakers National
 10 Annuity Trust Fund, applicant for appointment of interim lead counsel New Orleans
 11 Employees' Retirement System and MARTA/ATU Local 732 Employees Retirement Plan,
 12 and defendants WaMu Asset Acceptance Corporation, WaMu Capital Corporation,
 13 Washington Mutual Mortgage Securities Corporation, David Beck, Diane Novak, Rolland
 14 Jurgens and Richard Careaga, the Federal Deposit Insurance Corporation as Receiver for
 15 Washington Mutual Bank, and The First American Corporation and eAppraiseIT, LLC
 16 hereby, through their counsel of record, stipulate to and submit the following proposed
 17
 18 schedule for the filing of a consolidated complaint and motions to dismiss:
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20 1. The plaintiff(s) and counsel selected by the Court in this consolidated action
 21 shall have 60 days from entry of an order designating plaintiff(s) and class counsel to file a
 22 consolidated complaint in this action (the "Consolidated Complaint").
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24 2. The deadline for defendants to answer, move, or otherwise respond to the
 25 Consolidated Complaint will be 60 days after the date that lead plaintiff files the Consolidated
 26 Complaint.
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1 3. In the event that one or more defendants file a motion to dismiss the
 2 Consolidated Complaint, plaintiff(s) shall have 45 days after the filing of a motion to dismiss
 3 to file a response. A moving defendant shall have 30 days after the filing of plaintiff's
 4 response to file a reply.

5 DATED this ____ day of September, 2009.
 6

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1 **II. ORDER**
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5 IT IS SO ORDERED.
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9 DATED this _____ day of _____, 2009.
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The Honorable Marsha J. Pechman
United States District Judge

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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of September, 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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21 DATED this 28th day of September, 2009 at Seattle, Washington.

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